Operational Leakage

Session 1

- GL 91-18 Sections 6.14 and 6.15. Sections 6.14 and 6.15 are inconsistent with the approved technical specifications (current licensing basis) for flaws and leakages. Clarification is needed as to whether operability is defined with respect to technical specifications or to the overall operability design basis.

- Generic 90-05 (Guidance for Performing Temporary Non-Code Repair of ASME Code Class 1, 2, and 3 Piping). GL 91-18 is outdated with respect to its use of GL 90-05. There are alternative code cases for Class 3 piping, specifically N-513, which provides an alternative means of dealing with flaws and leakage separate from GL 90-05. GL 91-18 should recognize the fact that future code cases can provide alternative means also.

- Housekeeping versus non-code repairs. There needs to be some clarification between structural evaluations and housekeeping. For example, if a flaw or leak is structurally ok, i.e., it is operable with respect to technical specifications, then the flaw or leak should be handled under the corrective action process. Code inoperability does not necessarily mean technical specification inoperability.

- Compensatory actions. Can a licensee use compensatory actions to restore operability without a relief request with regards to operational leakage? Requiring a relief request does not seem to be the best use of NRC and industry resources.